

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

League of United Latin American Citizens -)	
Richmond Region Council 4614, Eliud)	
Bonilla, Luciania Freeman, Abby Jo)	
Gearhart, and Jeanne Rosen,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:18cv423 (LO/IDD)
)	
Public Interest Legal Foundation)	
and J. Christian Adams ,)	
)	
Defendants.)	
_____)	

DEFENDANTS’ RULE 12(b)(6) MOTION TO DISMISS

Defendants, Public Interest Legal Foundation (“PILF”) and J. Christian Adams (“Mr. Adams”), by counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully move this Court to dismiss Plaintiffs’ Complaint in its entirety. For the reasons set forth in the Memorandum in Support of Defendants’ Rule 12(b)(6) Motion to Dismiss being filed contemporaneously herewith, Plaintiffs’ Complaint fails to state any claim against Defendants upon which relief may be granted and fails to allege facts sufficient to establish legally cognizable causes of action. Furthermore, Plaintiff League of United Latin American Citizens – Richmond Region Council 4614 lacks standing to assert any claims against Defendants. Defendants therefore respectfully request that this Court dismiss the Complaint in its entirety, with prejudice, and that this Court award such other and further relief as the Court deems appropriate.

Dated: May 29, 2018

Respectfully submitted,

PUBLIC INTEREST LEGAL FOUNDATION
and J. CHRISTIAN ADAMS

By /s/ Michael J. Lockerby
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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May, 2018, I caused the foregoing DEFENDANTS' RULE 12(b)(6) MOTION TO DISMISS to be filed in the Alexandria Division of the United States District Court for the Eastern District of Virginia via the CM/ECF system, which will serve a Notice of Electronic Filing ("NEF") on all counsel of record, including:

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